

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

**MARTIN J. HENS, PAUL VAN VOORHEES, DAWNE
DOMAGALA, JENNIFER VITELLO, DANIEL MILLER,
AND PAUL PRINCE, INDIVIDUALLY AND ON BEHALF
OF ALL OTHERS SIMILARLY SITUATED,**

PLAINTIFFS,

V.

CLIENTLOGIC OPERATING CORPORATION,

DEFENDANT.

**NOTICE OF JOINT MOTION FOR
PROTECTIVE ORDER AND/OR TO SEAL
SETTLEMENT AGREEMENT**

**CIVIL ACTION No.:
05-CV-00381S(SR)**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Amy L. Hemenway, Esq., the Declaration of George A. Hanson, Esq., and the accompanying Memorandum of Law, Plaintiffs Martin J. Hens, Paul Van Voorhees, Dawne Domagala, Jennifer Vitello, Daniel Miller, and Paul Prince, individually and on behalf of all others similarly situated, and Defendant ClientLogic Operating Corporation, by and through their respective counsel, will jointly move this Court, Honorable William M. Skretny, at Part IV, 5th Floor, 68 Court Street, Buffalo, New York, on a date and time to be determined by the Court, for a protective order pursuant to Federal Rule of Civil Procedure 26(c)(1)(H) permitting the parties to submit the Settlement Agreement and Release of Claims *in camera* for approval or, alternatively, directing that the Settlement Agreement and Release of Claims be filed under seal. The parties also request an order directing that any references to the settlement generated as part of the public record, other than general references to the fact that this matter has settled, also be filed and maintained under seal.

Oral argument is requested at the Court's discretion and request.

Dated: Kansas City, Missouri
March 29, 2010

STUEVE SIEGEL HANSON LLP

By: 

George A. Hanson, Esq.

Attorneys for Plaintiff

460 Nichols Road, Suite 200

Kansas City, Missouri 64112

Telephone: (816) 714-7115

Email: hanson@stuevesiegel.com

Dated: Buffalo, New York
March 29, 2010

HARTER SECRET & EMERY LLP

By: 

Robert C. Weissflach, Esq.

Amy L. Hemenway, Esq.

Attorneys for Defendant

Twelve Fountain Plaza, Suite 400

Buffalo, New York 14202-2293

Telephone: (716) 853-1616

Email: rweissflach@hselaw.com

Email: ahemenway@hselaw.com

OUTTEN & GOLDEN, LLP

Justin M. Swartz, Esq.

Attorneys for Plaintiff

Three Park Avenue, 29th Floor

New York, New York 10016

Tel: (212) 245-1000

Email: jms@outtengolden.com